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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING SERVICE,
INC., a Nevada Corporation; J AND J
PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
SEYBERT; and ROLAND TANNER;

Defendants;

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2
INVESTMENTS, LLC; ROCKING HORSE
PROPERTIES, LLC; TRIPLE THREAT
BASKETBALL, LLC; ACAC LLC;
ANTHONY MICHAEL ALBERTO, JR.; and
MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612

Judge: James C. Mahan
Magistrate Judge: Elayna J. Youchah

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S AND
DEFENDANT JASON M.
JONGEWARD'S STIPULATION
CONCERNING LIVING EXPENSES
TO AND INCLUDING SEPTEMBER 30,
2022**

1 **WHEREAS**, on April 12, 2022, Plaintiff United States Securities and Exchange
 2 Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Complaint in this matter, alleging
 3 violations of the registration and/or antifraud provisions of the federal securities laws by
 4 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.
 5 No. 1.)

6 **WHEREAS**, on April 13, 2022, the Commission filed an Ex Parte Application for Entry
 7 of a Temporary Restraining Order and other equitable relief as to Defendants and an asset freeze
 8 as to Defendants and Relief Defendants (Dkt. No. 2), which was granted by the Court on April
 9 13, 2022. (Dkt. No. 3.)

10 **WHEREAS**, on April 21, 2022, the Court issued its Order Entering Preliminary
 11 Injunction, Asset Freeze, and other Equitable Relief as to Defendants and Relief Defendants,
 12 which, *inter alia*, continued the asset freeze imposed by the Court on April 13, 2022. (Dkt. No.
 13 56.) The Court’s Order provided that “any allowance for necessary and reasonable living
 14 expenses will be granted only upon good cause shown by application to the Court with notice
 15 and an opportunity for the Commission to be heard.”

16 **WHEREAS**, at the show cause hearing before the Court on April 21, 2022, the Court
 17 directed the parties to discuss any exceptions to the asset freeze for such necessary and
 18 reasonable living expenses before making such an application to the Court.

19 **WHEREAS**, counsel to the Commission and Defendant Jason M. Jongeward have
 20 reached the following agreement as to an allowance for living expenses up to and including
 21 September 30, 2022, and jointly provide this proposed agreement for approval by the Court:

- 22 1. Wells Fargo Account No. XXXXXX7160 (the “Wells Fargo Account”) held in
 23 the name of Jason M. Jongeward shall be unfrozen to allow Defendant Jongeward
 24 to pay living expenses and hold going-forward, earned income unconnected to the
 25 conduct alleged in the Complaint;
- 26 2. Defendant Jongeward may withdraw up to \$4844.00 per month—representing
 27 two times the IRS 2021 Allowable Living Expenses National Standards for a
 28

1 family of six—of previously-frozen funds from the Wells Fargo Account until
2 September 30, 2022 for necessary and reasonable living expenses;

3 3. Defendant Jongeward must provide to counsel to the Commission, without further
4 request or subpoena, the monthly account statements of the Wells Fargo Account
5 for review and inspection by no later than the 5th of each month this stipulation is
6 in effect. The Wells Fargo Account statements shall be provided to counsel to the
7 Commission by email to Casey R. Fronk (fronkc@sec.gov) and Tracy S. Combs
8 (combst@sec.gov);

9 4. To the extent Defendant Jongeward earns additional, going-forward income that
10 he demonstrates, to the satisfaction of counsel for the Commission, is
11 unconnected to the conduct alleged in the Complaint, such income may be used
12 for the payment of necessary and reasonable living expenses and payment of
13 attorney's fees.

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1 Dated: May 4, 2022

**U.S. SECURITIES AND EXCHANGE
COMMISSION**

2 /s/ Tracy S. Combs

3 TRACY S. COMBS

4 CASEY R. FRONK

5 *Attorneys for Petitioner U.S. Securities and
Exchange Commission*

6 Dated: May 4, 2022

7 /s/ Jason M. Jongeward

8 JASON M. JONGEWARD

9 *Pro Se*

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12 IT IS SO ORDERED:

13
14 JAMES C. MAHAN

15 UNITED STATES DISTRICT JUDGE

16
17 DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of May, 2022, I caused the **PLAINTIFF**
SECURITIES AND EXCHANGE COMMISSION'S AND DEFENDANT JASON M.
JONGEWARD'S STIPULATION CONCERNING LIVING EXPENSES TO AND
INCLUDING SEPTEMBER 30, 2022 to be served to all parties entitled to service through the
Court's ECF system and to the following individuals by the means indicated below:

By U.S. Mail, first class, postage prepaid, to:

Matthew Wade Beasley
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

BJ Holdings LLC
c/o Beasley Law Group PC, c/o Matthew Wade Beasley
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

The Judd Irrevocable Trust
c/o Trustee Matthew Wade Beasley
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

Jason M. Jongeward and JL2 Investments, LLC
[REDACTED]
Washington, UT [REDACTED]

Rocking Horse Properties, LLC
2176 Skyline Heights Lane
Henderson, NC 89052

PAJ Consulting, Inc
21371 Estepa Cir.
Huntington Beach CA 92648

Triple Threat Basketball, LLC
c/o Warren Rosegreen

1 [REDACTED]
Henderson, NV [REDACTED]

2 Anthony Michael Alberto, Jr. and Monty Crew, LLC

3 [REDACTED]
4 Philadelphia, PA [REDACTED]

5 The Judd Irrevocable Trust
6 c/o Jeffrey Judd

7 [REDACTED]
Henderson, NV [REDACTED]

8 *By email to the following:*

9 Dyke Huish

10 Huish Law Firm

huishlaw@mac.com

11 *Counsel for Roland Tanner*

12 Daniel Hill

13 Snow, Christensen & Martineau, P.C.

14 DDH@scmlaw.com

Counsel for ACAC LLC

16 /s/ Tracy S. Combs

17 Tracy S. Combs
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